

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                                  |   |                     |
|----------------------------------|---|---------------------|
| AVENTIS PHARMACEUTICALS INC. and | ) |                     |
| SANOFI-AVENTIS US LLC,           | ) |                     |
|                                  | ) |                     |
|                                  | ) |                     |
| Plaintiffs,                      | ) | C.A. No. 06-286-GMS |
|                                  | ) |                     |
| v.                               | ) |                     |
|                                  | ) |                     |
| BARR LABORATORIES, INC.          | ) |                     |
|                                  | ) |                     |
| Defendants.                      | ) |                     |

**STIPULATED ORDER**

WHEREAS Aventis Pharmaceuticals Inc. and Sanofi-Aventis US LLC (“Aventis”) and Barr Laboratories, Inc. (“Barr”) are the parties to Civil Action No. 06-286 (GMS) (the “action” or “litigation”),

WHEREAS Barr has requested that Aventis produce for inspection and copying IMS Health Incorporated’s (“IMS”) confidential physician-level Xponent<sup>TM</sup> information which must be protected in order to preserve IMS’s legitimate business interests,

WHEREAS IMS seeks certain protections to prevent unnecessary dissemination or disclosure of IMS’s confidential physician-level Xponent<sup>TM</sup> information, and

WHEREAS, the parties have agreed, subject to the approval and order of the Court, to entry of this Stipulated Order;

IT IS HEREBY ORDERED that:

Aventis’s production of IMS’s physician-level Xponent<sup>TM</sup> information will be subject to the terms of the Stipulated Protective Order entered by the Court on August 22, 2006 (D.I. 29)

except that physician-level Xponent™ information shall be considered “Highly Confidential” Information and access to it shall be limited to those persons identified in Paragraphs 6(a)(i), (iii), (iv), (v), (vi), (vii), (viii), (ix), (x), (xi), (xii), and (xiii). Further, IMS’s physician-level Xponent™ information shall not be used for the purpose of proving that the listed prescribers prescribed what is in the data. These limits on the accessibility of IMS’s physician-level Xponent™ information will be preserved throughout any court proceeding. Accordingly, the parties will provide IMS with reasonable notice, and an opportunity to object, if any of IMS’s physician-level Xponent™ information is to be used in open proceedings.

ASHBY & GEDDES

YOUNG CONAWAY STARGATT  
& TAYLOR, LLP

*/s/ Tiffany Geyer Lydon*

*/s/ Josy W. Ingersoll*

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*Attorneys for Plaintiffs Aventis  
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*Attorneys for Defendant Barr  
Laboratories, Inc.*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

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United States District Judge